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April 4, 2022

VIA ECF

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

APPLICATION GRANTED
SO ORDERED *Nen Bla*
VERNON S. BRODERICK
U.S.D.J. 04/06/22

The parties are directed to Rule 5.B. of my Individual Rules & Practices in Civil Cases and to meet and confer as necessary to determine if the written responses can be filed in redacted form on ECF.

Re: Re: *Spectrum Dynamics Medical Limited v. GE*; Case No.: 18-cv-11386 (VSB)

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule 5.B. of your Honor’s Individual Practices in Civil Cases to respectfully request permission to file under seal Plaintiff’s written responses to the questions posed in Your Honor’s March 24, 2022 Order (Doc. 433), and accompanying Appendices 1-2 and 4-6 filed today, April 4, 2022. Additionally, Plaintiff respectfully requests permission to file under seal Plaintiff’s slides presented during the March 22, 2022 preliminary injunction hearing.

Plaintiff requests permission to file the written responses including Appendices 1-2 and 4-6 thereto and the March 22, 2022 preliminary injunction hearing presentation slides under seal because the documents contain information designated as “Highly Confidential – Attorneys’ Eyes Only” by the respective parties under the Stipulated Confidentiality and Protective Order (Doc. 156).

Respectfully submitted,

/Neil F. Greenblum/

Neil F. Greenblum

cc: All counsel of record (via ECF)